

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	No. 19-cr-764
)	
)	
Surrayah Hill,)	
)	
Defendant.)	

MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

Comes now attorney Daniel R. Schattnik and hereby moves this Honorable Court for an extension of time to file pretrial motions, and in support thereof states:

1. The undersigned adopts the comparable motion (Doc. 107) recently filed on behalf of co-defendant Hunter in that the same COVID-19 related issues and hurdles cited by his counsel also apply to Defendant Hill.

2. This matter is has been designated a complex case (Doc. 55) due to both the nature of the alleged offense and the amount and type of discovery materials that have been provided.

3. Counsel requires additional time to evaluate the need for the filing of pretrial motions in this matter.

4. The government has extended an initial plea offer to resolve this case, which needs to be discussed with the client and explored before decisions on motions are made.

5. That the current coronavirus situation has made it difficult, if not impossible, to have meaningful direct discussions with the client regarding the discovery materials, as well as to discuss other aspects of the case; at present Ms. Hill is located at the St. Louis City Justice Center; communication with her are limited to video-zoom meetings rather than in-person consultation,

which has made the process more problematic.

WHEREFORE Defendant prays that this Honorable Court extend the deadline for the filing of pretrial motions an additional sixty (60) days, or for whatever other period of time this Honorable Court deems appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on 19th day of January, 2021 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/S/ Daniel R. Schattnik
Daniel R. Schattnik, #03122234 IL